

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
AIKEN DIVISION

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|---|---|------------------------------------|
| STATE OF SOUTH CAROLINA, |) | Civil Action No. 1:19-cv-03132-RMG |
| SOUTH CAROLINA DEPARTMENT |) | |
| OF HEALTH & ENVIRONMENTAL |) | |
| CONTROL, and |) | |
| SAVANNAH RIVER MARITIME |) | |
| COMMISSION, |) | |
| |) | |
| Plaintiffs, |) | |
| |) | |
| v. |) | |
| |) | |
| UNITED STATES ARMY CORPS |) | |
| OF ENGINEERS, |) | |
| UNITED STATES ARMY CORPS OF |) | |
| ENGINEERS SAVANNAH DISTRICT, |) | |
| RYAN McCARTHY, in his official |) | |
| capacity as Secretary of the Army, |) | |
| LT. GENERAL TODD T. SEMONITE, in his |) | |
| official capacity as Commanding General and |) | |
| Chief of Engineers, U.S. Army Corps of Engineers, |) | |
| MAJOR GENERAL DIANA M. HOLLAND, |) | |
| in her official capacity as Commanding General, |) | |
| South Atlantic Division, U.S. Army Corps of |) | |
| Engineers, and |) | |
| COLONEL DANIEL H. HIBNER, |) | |
| in his official capacity as District Engineer, |) | |
| U.S. Army Corps of Engineers, Savannah District, |) | |
| |) | |
| Defendants. |) | |

**FEDERAL DEFENDANTS’ RESPONSE TO AUGUSTA, GEORGIA’S MOTION FOR
LEAVE TO INTERVENE**

Federal Defendants take no position on Augusta, Georgia’s (“Augusta”) Motion to Intervene (the “Motion”) (ECF No. 6). If the Court grants the Motion, Federal Defendants respectfully request that the Court order Augusta to (1) abide by any deadlines applicable to Plaintiffs, and (2) make a good faith effort to coordinate with Plaintiffs, and any other plaintiff-intervenors, on briefs and filings submitted to the Court so that their submissions do not overlap

and are not duplicative.

Federal Defendants submit that these customary conditions will streamline this litigation, and promote efficiency and judicial economy.

Respectfully submitted this 20th day of December, 2019.

JEAN E. WILLIAMS
Deputy Assistant Attorney General
U.S. Department of Justice
Environment & Natural Resources Division

/s/ Sally J. Sullivan
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CERTIFICATE OF SERVICE

I hereby certify that on December 20, 2019, I electronically filed the foregoing Federal Defendants' Response to Augusta, Georgia's Motion to Intervene with the Clerk of Court using the CM/ECF system, which will send electronic notification of such filing to all counsel of record.

/s/ Sally J. Sullivan